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Attorneys for Defendant and Counterclaimant Skyryse, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.

Plaintiff.

V

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50,

Defendants.

SKYRYSE, INC.,

Counterclaimant,

V

MOOG INC.,

Counterclaim-Defendant.

CASE NO. 2:22-cv-09094-GW-MAR

**DEFENDANT-COUNTERCLAIMANT
SKYRYSE, INC.'S APPLICATION
FOR LEAVE TO LODGE UNDER
SEAL CERTAIN PORTIONS OF
JOINT STIPULATION RE:
DEFENDANTS' MOTION TO
OVERRULE MOOG'S OBJECTION
TO SKYRYSE'S DISCLOSURE OF
CONFIDENTIAL INFORMATION
TO VINCENT SOCCI AND
ACCOMPANYING DECLARATIONS
AND EXHIBITS**

Hon. Margo A. Rocconi

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that, pursuant to Local Rule 79-5.2.2(b), Defendant
 3 and Counterclaimant Skyryse, Inc. (“Skyryse”) hereby applies for an order
 4 permitting the following documents filed in connection with the parties’ Joint
 5 Stipulation Re: Defendants’ Motion to Overrule Moog’s Objection to Skyryse’s
 6 Disclosure of Confidential Information to Vincent Socc.

Document	Designating Party	Text to be Filed/Lodged under Seal
Joint Stipulation Re: Defendants’ Motion to Overrule Moog’s Objection to Skyryse’s Disclosure of Confidential Information to Vincent Socc	Moog	Highlighted portions in the unredacted version at pages: 18-20, 23, 25-26, 28
Declaration of Keith Pieroni	Moog	Highlighted portions in the unredacted version at pages: 3-6
Exhibits to Declaration of Keith Pieroni	Moog	Exhibits A, B, and C in their entirety

19 As the Filing Party, Skyryse has provisionally lodged under seal certain
 20 portions of the Joint Stipulation and accompanying documents that Plaintiff and
 21 Counterclaim-Defendant Moog, Inc. has designated as Protected Material under the
 22 Protective Order entered in this action, dated May 6, 2022 (Dkt. 89), or that Moog
 23 has otherwise requested to be sealed. Accordingly, pursuant to paragraph 12.1 of the
 24 Protective Order, Skyryse seeks to provisionally lodge these materials under seal
 25 until such time as Moog withdraws its confidentiality designations or the Court rules
 26 on a forthcoming application from Moog to justify that these documents, or portions
 27
 28

1 of thereof, remain under seal. Skyryse reserves all rights under the Protective Order
 2 to challenge Moog's designations of the identified materials as Protected Material.

3 This application is further based upon the accompanying Declaration of
 4 Cassandra M. Baloga in Support of this Application; any pleadings, files, and
 5 records in this action; and any further evidence or argument as this Court may
 6 consider.

7 Between May 25, 2023 and June 7, 2023, counsel for Skyryse conferred via
 8 email with counsel for Moog regarding the Joint Stipulation. On June 5, 2023,
 9 counsel for Moog approved the Joint Stipulation and accompanying documents for
 10 filing, but requested to redact certain portions of the Joint Stipulation from the public
 11 docket and file them under seal. Counsel for Moog stated that Moog's proposed
 12 redactions involved materials designated as Highly Confidential – Attorney's Eyes
 13 Only pursuant to the Protective Order.

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15 Dated: June 7, 2023

Respectfully submitted,

16 LATHAM & WATKINS LLP

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By: /s/ Gabriel S. Gross

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